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Attorney for City Defendants

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

KEVIN BRATCHER,

Plaintiff,

v.

POLK COUNTY, CITY OF SALEM, DEPUTY MICHAEL H. SMITH, in his individual capacity, and DOES 1-2, in their individual capacity,

Defendants.

Case No. 3:20-CV-02056-SB

SUPPLEMENTAL DECLARATION OF JENNIFER M. GADDIS IN SUPPORT OF CITY DEFENDANTS' REPLY TO PLAINTIFF'S RESPONSE TO DEFENDANTS' MOTION FOR SUMMARY JUDGMENT

I, Jennifer M. Gaddis, hereby declare under penalty of perjury that the following is true and correct based upon my personal knowledge:

1. I am the attorney representing the City Defendants in this matter. This Supplemental Declaration is offered to present documents and deposition transcript testimonies to the Court in support of City Defendants' Motion for Summary Judgment and Reply.
2. Attached to this Declaration and marked "Exhibit 2" is a true and correct copy of the email dated January 4, 2021, sent to plaintiff's counsel.

3. Attached to this Declaration and marked “Exhibit 3” is a true and correct copy of the email dated January 29, 2021, sent to plaintiff’s counsel.

4. Attached to this Declaration and marked “Exhibit 4” are excerpts of the deposition testimony of Jason W. Donner, taken on behalf of plaintiff on November 19, 2021.

5. Attached to this Declaration and marked “Exhibit 5” are excerpts of the deposition testimony of Chad A. Galusha taken on behalf of plaintiff on November 19, 2021.

I hereby declare under penalty of perjury that the foregoing is true and correct.

DATED: April 18, 2022.

s/Jennifer M. Gaddis
Jennifer M. Gaddis, OSB 071194
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Attorney for City Defendants